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July 21, 2021

VIA ECF

The Honorable James L. Cott
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Caitlin H. Dickerson v. Customs and Border Protection*, 19 Civ. 9017 (JLC)

Dear Judge Cott:

The undersigned counsel represent Plaintiff Caitlin H. Dickerson in the above-referenced Freedom of Information Act (“FOIA”) action. We write to request a two-month extension of time, from August 31, 2021, to October 31, 2021, for Plaintiff to file any claim for fees and costs pursuant to 5 U.S.C. § 552(a)(4)(E). CBP consents to this request.

On June 10, 2021, in light of the parties’ stipulation, this Court so-ordered a cancellation of the briefing schedule previously approved by the Court regarding the parties’ anticipated cross-motions for summary judgment. Additionally, this Court so-ordered that Plaintiff shall have until August 31, 2021 to file any fees application. On June 11, 2021, this Court ordered a dismissal of the case on the merits, while retaining jurisdiction to adjudicate any fees application filed by Plaintiff.

In the past month, Plaintiff’s counsel have faced unforeseen circumstances that have imposed significant limitations on counsel’s time, including one counsel’s upcoming departure to another position and another counsel’s unexpected family health obligations. Due to these unanticipated burdens, Plaintiff respectfully requests an extension to October 31, 2021, for Plaintiff to file any fees application.

This is Plaintiff’s first request for an extension of this deadline.

Thank you for consideration of this matter.

Respectfully,

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/s/ Laura Handman
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cc: Counsel of record (via ECF)